IN THE UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

DWIGHT RUSSELL, et al.,	
Plaintiffs,	
v. HARRIS COUNTY, TEXAS, et al., Defendants.	Civil Action No. 4:19-cv-226

UNOPPOSED MOTION TO INTERVENE BY THE STATE OF TEXAS

The State of Texas, by and through the Attorney General of Texas, and pursuant to Federal Rule of Civil Procedure 24, move to intervene in the above-captioned action. In support of this Motion, the State relies on the following contemporaneously filed documents:

- 1. Memorandum in Support of Motion to Intervene; and
- 2. [Proposed] Order Granting State Intervenors' Motion to Intervene.

For the reasons stated in this Motion and accompanying documents, the State of Texas respectfully request that the Court grant this Motion to Intervene.

Respectfully submitted.

KEN PAXTON Attorney General of Texas

BRENT WEBSTER First Assistant Attorney General

GRANT DORFMAN Deputy First Assistant Attorney General

ERIC A. HUDSON
Special Counsel
Special Litigation Unit
State Bar 24059977
Southern District ID: 1000759
Eric.Hudson@oag.texas.gov
P.O. Box 12548, Capitol Station
Austin, Texas 78711-2548
(512) 936-1414 | FAX: (512) 936-0545

SHAWN COWLES
Deputy Attorney General for
Civil Litigation

THOMAS A. ALBRIGHT Chief for General Litigation Division

/s/ Kimberly Gdula
KIMBERLY GDULA
Attorney-in-Charge
State Bar 24052209 | So. Dist. 1092074
Kimberly.Gdula@oag.texas.gov

Assistant Attorney General General Litigation Division P.O. Box 12548, Capitol Station Austin, Texas 78711-2548 (512) 463-2120 | FAX: (512) 320-0667

CERTIFICATE OF CONFERENCE

I hereby certify that, I conferred with counsel for Plaintiffs and Defendants via email on January 22, 2021, regarding the relief sought in the foregoing instrument. The parties have indicated they are not opposed to the State's request to intervene.

/s/ Kimberly Gdula
Kimberly Gdula
Assistant Attorney General

CERTIFICATE OF SERVICE

I, Kimberly Gdula, hereby certify that on this the 22nd day of January, 2021, a true and correct copy of the foregoing document was transmitted using the CM/ECF system, which automatically sends notice and a copy of the filing to all counsel of record.

/s/ Kimberly Gdula
Kimberly Gdula
Assistant Attorney General